

SECRET

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GREEK ORTHODOX ARCHDIOCESE
FOUNDATION, by and through GEORGE KERITSIS,
TRUSTEE, individually and on behalf of all others
similarly situated,

Plaintiff,

v.

THE BEAR STEARNS COMPANIES INC., JAMES E.
CAYNE, ALAN D. SCHWARTZ, and SAMUEL L.
MOLINARO, JR.,

Defendants.

08 CV 03013 (RWS)



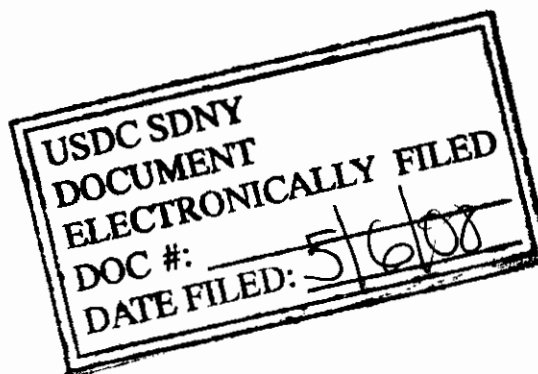
STIPULATION AND [PROPOSED] ORDER

WHEREAS, the Complaint in the above-captioned action (the "Action")
was served on Defendant The Bear Stearns Companies Inc. ("Bear Stearns") on April 3,
2008, and Bear Stearns' Answer would have been due on April 23, 2008;

WHEREAS, there have been no previous requests for an extension of time
to answer, move against, or otherwise respond to the Complaint served in the Action;

IT IS HEREBY STIPULATED AND AGREED, by and between the
undersigned counsel for the parties to these actions, as follows:

1. Defendants shall not be required to answer or otherwise respond to, and
are hereby expressly relieved from answering or otherwise responding to, the Complaint
served in the Action until after the decision on plaintiff's Motion for Appointment as
Lead Plaintiff and Lead Counsel, at which time the parties will confer on a schedule for
responding to the Complaint.



IT IS FURTHER STIPULATED AND AGREED that nothing herein shall
be deemed to constitute a waiver of any defenses in the Action. Defendants reserve all
arguments and defenses in the Action.

Dated: April 30, 2008
New York, New York

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SO ORDERED:


U.S.D.J.
5-6-08

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